

**EXHIBIT 1**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

**SAMPLE**

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JKF)  
) Jointly Administered  
Debtors. )  
)  
) **Hearing Date: Not Applicable**  
) **Responses Due: April 29, 2005**

**Claimant: ELLETSON, RODNEY**  
**Claim Number: 5561**  
**Date Claim Filed: 3/24/2003**

**DEBTORS' SECOND NOTICE CONCERNING INTENT TO OBJECT TO CLAIMS ON  
THE BASIS OF MATERIALLY INSUFFICIENT SUPPORTING INFORMATION AND  
OPPORTUNITY TO SUPPLEMENT CLAIMS**

On December 6, 2004, the Debtors filed and served upon you the Debtors' Notice of Intent to Object to Claims on the Basis of Materially Insufficient Supporting Information and Opportunity to Supplement Claim (the "Notice").

On February 14, 2005, the Court entered an order [Docket No. 7771] (the "Gateway Supplemental Notice Order") pursuant to which the Debtors were directed to mail a second

---

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

notice to you setting forth, in reasonable detail, why the Debtors believe the documentation you supplied with your claim is materially insufficient (the "Second Notice").

Attached as Exhibit A is a checklist which (1) outlines the documentation that is missing from your claim or (2) explains the reasons why the Debtors believe that the documentation that was provided with your claim is materially insufficient. PLEASE NOTE that if a question on the checklist is not marked, it means you (1) responded to that question by indicating that you have no documentation or (2) your response to this question was adequate, and in either case, the Debtors are not expecting further information from you at this time with respect to this question, although you are free to provide documentation if you have obtained any since filing your proof of claim. However, this does not mean the Debtors believe your documentation is sufficient to sustain your claim and the Debtors reserve their rights to object to your claim on any and all grounds.

**PLEASE TAKE NOTICE** that you have sixty (60) days (the "Response Period") from the date of this Second Notice in which to provide any supplemental or additional information supporting your claim. Such information must be sent to the following addresses:

**By Mail:**

Rust Consulting, Inc.  
Claims Processing Agent  
Re: W.R. Grace and Co. (Supplemental Information)  
P.O. Box 162  
Faribault, Minnesota 55021-1620

**By Courier:**

Rust Consulting, Inc.  
Claims Processing Agent  
Re: W.R. Grace and Co. (Supplemental Information)  
201 South Lyndale Avenue  
Faribault, Minnesota 55021

-and-

## **EXHIBIT A**

**Attorney:** LEWIS, TOM

**Law Firm:** LEWIS HUPPERT & SLOVAK PC

**Claim Number:** 5561

**Claimant:** ELLETSON, RODNEY

As described below, certain questions on the Asbestos Property Damage Proof of Claim Form require the claimant to provide documents. On the Claim Form identified above, the following checked questions were not answered or were not responded to properly, for the reason(s) stated:

☐ **Category 1 Claim:** ☐ Category 1 Comments:

16. Documents relating to the purchase and/or installation of the product in the property.

☐ No documents were provided.

☐ Documents provided are insufficient because:

18. Documents concerning when the claimant first knew of the presence of asbestos in the property.

☐ No documents were provided.

☐ Documents provided are insufficient because:

22. Documents concerning efforts to remove, contain and/or abate the Grace product.

☐ No documents were provided.

☐ Documents provided are insufficient because:

26. Documents concerning testing or sampling for asbestos in the property.

☐ No documents were provided.

☐ Documents provided are insufficient because:

**Attorney:** LEWIS, TOM  
**Law Firm:** LEWIS HUPPERT & SLOVAK PC  
**Claim Number:** 5561  
**Claimant:** ELLETSON, RODNEY

☒ **Category 2 Claim:** ☐ **Category 2 Comments:**

38. Documents concerning efforts to remove, contain and/or abate the asbestos on the property.

☐ No documents were provided.

☐ Documents provided are insufficient because:

42. Documents concerning testing or sampling for asbestos on the property.

☒ No documents were provided.

☐ Documents provided are insufficient because: